

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed August 26, 2005. Claims 1-3 and 5-33 were pending in the Application. In the Office Action, Claims 1-3 and 5-33 were rejected. Thus, Claims 1-3 and 5-33 remain pending in the Application. Applicants respectfully request reconsideration and favorable action in this case.

In the Office Action, the following actions were taken or matters were raised:

SECTION 102 REJECTIONS

Claims 1-3, 5-11 and 26-33 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,515,511 issued to Nguyen et al. (hereinafter "*Nguyen*"). Claims 1, 26 and 29 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2002/0059589 issued to Park (hereinafter "*Park*"). Applicants respectfully traverse these rejections.

Park Reference

Applicants respectfully submit that Claims 1, 26 and 29 of the present Application are patentable over *Park*. However, Applicants have elected not to address the patentability of Claims 1, 26 and 29 over *Park* and instead submit that *Park* does not qualify as prior art under Section 102(e) and, therefore, no *prima facie* rejection has been made. By making this choice, Applicants do not admit the accuracy of the Examiner's remarks or reasoning or acquiescing in any way to the reasoning underlying the rejection.

Applicants conceived of the invention which is the subject of the present Application prior to August 30, 2001, the purported effective date of *Park*. In support thereof, Applicants submit the accompanying Declaration under 37 C.F.R. §1.131, the exhibit of which evidences the conception of the invention prior to the purported effective date of *Park*. Further, Applicants submit that the accompanying Declaration under 37 C.F.R. §1.131 evidences diligence in the completion of the invention which is the subject of the present Application from a time prior to

the purported effective date of *Park* continuously up to the date of filing of the present Application. Accordingly, Applicants respectfully request that the rejection of Claims 1, 26 and 29 based on *Park* be withdrawn.

Nguyen Reference

Applicants respectfully submit that *Nguyen* does not disclose or even suggest each and every limitation of Claims 1-3, 5-11 and 26-33. Of the rejected claims, Claims 1 and 26 are independent.

Independent Claim 1 recites “a frame buffer operable to store graphics image data rendered by the graphics adapter.” In the Office Action, the Examiner refers to the “supporting memory” of the system controller 101 of *Nguyen* as corresponding to the frame buffer recited by Claim 1, and the Examiner refers to the video compositor 108 of *Nguyen* as corresponding to the graphics adapter recited by Claim 1 (Office Action, page 2). Applicants respectfully disagree. *Nguyen* recites:

C-box 10 includes a central processing unit (CPU) and supporting memory, here generally indicated as the system controller 101, attached to the bus 100. The system controller 101 is the software/hardware control mechanism for allocating analog frequencies for the transmission of video for the network of the analog display stations, for allocating the video processors, and for allocating requests for video materials.

(*Nguyen*, column 2, lines 50-57). *Nguyen* also recites:

[T]he video compositor 108 combines the multiple digital video streams into one stream.

(*Nguyen*, column 4, lines 18-20). Applicants respectfully submit that *Nguyen* does not disclose or even suggest, nor has the Examiner explicitly identified any such disclosure in *Nguyen*, that the video compositor 108 of *Nguyen* performs any “rendering” function. To the contrary, the video compositor 108 of *Nguyen* appears to be limited to combining multiple digital video

streams into a single stream. Further, *Nguyen* does not disclose or even suggest, nor has the Examiner explicitly identified any such disclosure in *Nguyen*, that any single digital video stream formed by the video compositor 108 of *Nguyen* is stored by the “‘supporting memory’ in ‘system controller’; 101” as asserted by the Examiner in the Office Action. Accordingly, for at least these reasons, *Nguyen* does not anticipate independent Claim 1.

Independent Claim 1 also recites:

a network chip coupled to the frame buffer, the network chip comprising:

a compression unit operable to compress graphics image data of said frame buffer into compressed graphics image data; and

a network interface operable to receive at least a portion of said compressed graphics image data, said network interface further operable to format said received compressed graphics image data into a plurality of packets for transmission over a communication network

(emphasis added). In the Office Action, the Examiner does not explicitly identify any particular structure or element of *Nguyen* as corresponding to the “network chip” recited by Claim 1. Instead, the Examiner refers generally to a variety of different elements in *Nguyen* (“103-105, 112-114” (Office Action, page 2)). The Examiner then equates the reference numerals of *Nguyen* referred to by the Examiner as corresponding to the “network chip” recited by Claim 1 (i.e., “103-105, 112-114”) as also corresponding to the “compression unit” and “network interface” recited by Claim 1 (“the network chip comprising: a compression unit [112-114];” “a network interface [103-105]” (Office Action, pages 2 and 3)). Applicants respectfully submit that such an interpretation is an improper claim construction at least because the Examiner is using the same elements of *Nguyen* (i.e., “103-105, 112-114”) to correspond to the “network chip” and either the “compression unit” or “network interface” of the network chip recited by Claim 1. Additionally, *Nguyen* does not disclose or even suggest, nor has the Examiner explicitly identified any such disclosure in *Nguyen*, that such elements of *Nguyen* (i.e., “103-105, 112-114”) are each disposed

on a “network chip” as recited by Claim 1. Accordingly, for at least these reasons also, *Nguyen* does not anticipate independent Claim 1.

Additionally, in the Office Action, the Examiner refers to the video compositor 108 of *Nguyen* as corresponding to the “graphics adapter” recited by Claim 1 (Office Action, page 2). Even if the video compositor 108 of *Nguyen* was to be considered to correspond to the “graphics adapter” recited by Claim 1, which Applicants respectfully disagree, *Nguyen* fails to disclose or even suggest the limitations of independent Claim 1. For example, *Nguyen* recites:

[T]he video compositor 108 combines the multiple digital video streams into one stream. It is preferable for the composition to occur in the compressed video domain.

(*Nguyen*, column 4, lines 18-21) (emphasis added). Claim 1 recites “a compression unit operable to compress graphics image data of said frame buffer into compressed graphics image data” (emphasis added). Based on the Examiner’s asserted teachings of the *Nguyen* reference, the data stream produced by the video compositor 108 of *Nguyen* appears to already be in a compressed format. Accordingly, Applicants respectfully submit that *Nguyen* does not disclose or even suggest “a frame buffer operable to store graphics image data rendered by the graphics adapter” and “a compression unit operable to compress graphics image data of said frame buffer into compressed graphics image data as recited by Claim 1 (emphasis added). Accordingly, for at least this reason also, Applicants respectfully submit that *Nguyen* does not anticipate Claim 1.

Independent Claim 26 recites “a frame buffer operable to store graphics image data” and “a network attachable graphics chip coupled to said frame buffer” where the network attachable graphics chip comprises “a graphics unit operable to render a graphics image, said graphics unit further operable to provide graphics image data relating to said rendered image to said frame buffer,” “a compression unit operable to compress graphics image data of said frame buffer into compressed graphics image data” and “a network interface operable to format said compressed graphics image data into a plurality of packets for transmission over a communication network” (emphasis added). Independent Claim 29 recites “a graphics unit adapted to render graphics

image data,” “a frame buffer operable to store said graphics image data” and “a network interface operable to receive at least a portion of said graphics image data from said frame buffer, said network interface further operable to format said received graphics image data into a plurality of packets for transmission over a communication network” (emphasis added). At least for the reasons discussed above in connection with independent Claim 1, Applicants respectfully submit that *Nguyen* also does not anticipate Claims 26 and 29.

Claims 2, 3, 5-11 and 27, 28 and 30-33 that depend respectively from independent Claims 1, 26 and 29 are also not anticipated by *Nguyen* at least because they incorporate the limitations of respective Claims 1, 26 and 29 and, also, they add additional elements that further distinguish *Nguyen*. Therefore, Applicants respectfully request that the rejection of Claims 1-3, 5-11 and 26-33 be withdrawn.

SECTION 103 REJECTIONS

Claims 12-25 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Nguyen* in view of U.S. Patent No. 6,304,895 issued to Schneider et al. (hereinafter “*Scheinder*”). Applicants respectfully traverse this rejection.

Of the rejected claims, Claims 12 and 19 are independent. Applicants respectfully submit that the Examiner has failed to establish a *prima facie* case of obviousness under 35 U.S.C. 103(a). For example, in the Office Action, the Examiner states:

Regarding Claim 12, *Nguyen* does not specifically disclose that “logically dividing a frame buffer of a graphics adapter into a plurality of segments.” However, such limitation is shown in the teaching of *Schneider* [‘memory is physically divide into pages’ within video adapter of computer; See col 12 line 43 – col 13 line 23].

(Office action, page 7). Initially, while the Examiner indicates what the Examiner believes *Nguyen* does not disclose, the Examiner has not indicated how *Nguyen* purportedly meets the remaining limitations of Claim 12, thereby making it difficult, if not impossible, for Applicants

to fully and/or adequately address the Examiner's rejection of Claim 12. For example, Claim 12 recites "logically dividing a frame buffer of a graphics adapter into a plurality of segments." The Examiner has not indicated what element of *Nguyen* the Examiner considers to correspond to the "graphics adapter" recited by Claim 12. Based on the Examiner's 35 U.S.C § 102 rejection, Applicants presume that the Examiner considers the video compositor 108 of *Nguyen* to correspond to the "graphics adapter" recited by Claim 12 (Office Action, page 2). However, using the foregoing assumption, *Nguyen* does not disclose or even suggest that the video compositor 108 of *Nguyen* has a "frame buffer" as is required by Applicants' Claim 12 ("a frame buffer of a graphics adapter"). To the contrary, the Examiner appears to consider the "supporting memory" of the system controller 101 of *Nguyen* as corresponding to the frame buffer (Office Action, page 2), which is clearly not part of the video compositor 108 of *Nguyen*. Therefore, for at least this reason, Applicants respectfully submit that the rejection of Claim 12 is improper and should be withdrawn.

Further, Claim 12 recites "logically dividing a frame buffer of a graphics adapter into a plurality of segments, at least one segment of said plurality of segments storing graphics image data rendered by the graphics adapter" (emphasis added). As discussed above in connection with independent Claim 1, *Nguyen* does not disclose or even suggest any "rendering" function. Moreover, *Schneider* does not appear to remedy at least this deficiency of *Nguyen*, nor did the Examiner rely on *Schneider* to purportedly teach the above-referenced limitation of Claim 12.

Additionally, Applicants respectfully submit that there is no motivation or suggestion to combine reference teachings as suggested by the Examiner. For example, in the Office Action, the Examiner states:

It would have been obvious to one skilled in the art to incorporate the teaching of *Schneider* into the teaching of *Nguyen* in order to improve the performance of memory with faster identification/retrieval of graphic data, as such improvement is also advantageously desirable in the teaching of *Nguyen* for performing the video distribution system with optimization.

(Office Action, page 7). Applicants respectfully disagree. *Nguyen* appears to disclose adapters 111 to 114 for “receiv[ing] a compressed video (and audio) stream from the bus 100, decompress[ing] the stream, convert[ing] the digital image (and sound) into analog, and deliver[ing] this analog stream to an end user workstation 13₁ to 13_n” (*Nguyen*, column 3, lines 40-45). The Examiner has not explicitly identified what, if any, memory device of *Nguyen* is to be “logically divided” as suggested by the Examiner. In fact, the Examiner has not explicitly identified any particular memory device of *Nguyen* that is used for storing image data in the *Nguyen* system. Moreover, the Examiner has not indicated how the *Nguyen* system is lacking in speed/performance as to necessitate the proposed combination of *Schneider* therewith, or how the proposed combination of *Schneider* therewith would be implemented in the *Nguyen* system. Accordingly, for at least these reasons, Applicants respectfully submit that the proposed combination of references is improper.

Moreover, even if the proposed references are combined, which Applicants submit is improper, the proposed combination of references do not disclose, teach or suggest the limitations of Claim 12. For example, even if *Nguyen* was modified as suggested by the Examiner to “logically divide” some unspecified memory device of *Nguyen*, the proposed combination of references do not disclose, teach or even suggest that any such division would “correspond[] to a particular destination device” as recited by Claim 12. Accordingly, for at least this reason also, Applicants submit that the rejection of Claim 12 is improper and should be withdrawn.

Independent Claim 19 recites, at least in part, “comparing graphics image data of a new image for a particular destination device of a plurality of destination devices with graphics image data of a previous image for said particular destination device stored in a frame buffer of a graphics adapter remote from said particular destination device, said graphics adapter rendering said graphics image data for said new image and said previous image” and “selecting blocks of graphics image data of said new image that are different from corresponding blocks of graphics

image data of said previous image” (emphasis added). At least for the reasons discussed above in connection with independent Claim 12, Applicants respectfully submit that the rejection of Claim 19 is also improper and should be withdrawn. For example, in the Office Action, the Examiner states that “*Nguyen* does not specifically disclose [sic] that ‘comparing graphics image data of a new image’” (Office Action, pages 8 and 9). Thus, while the Examiner indicates what the Examiner believes *Nguyen* does not disclose, the Examiner has not indicated how *Nguyen* purportedly meets the remaining limitations of Claim 19, thereby making it difficult, if not impossible, for Applicants to fully and/or adequately address the Examiner’s rejection of Claim 19. Further, Applicants respectfully submit that *Nguyen* does not disclose or even suggest any “rendering” function. Moreover, *Schneider* does not appear to remedy at least this deficiency of *Nguyen*, nor did the Examiner rely on *Schneider* to purportedly teach the above-referenced limitation of Claim 19.

Additionally, as discussed above, *Nguyen* appears to disclose adapters 111 to 114 for “receiv[ing] a compressed video (and audio) stream from the bus 100, decompress[ing] the stream, convert[ing] the digital image (and sound) into analog, and deliver[ing] this analog stream to an end user workstation 13₁ to 13_n” (*Nguyen*, column 3, lines 40-45). The Examiner has not explicitly identified any particular memory device of *Nguyen* that is used for storing image data in the *Nguyen* system, or how any of such images of the streamed content of the *Nguyen* would be compared. In fact, Applicants respectfully submit that there is no motivation or suggestion to combine reference teachings as suggested by the Examiner at least because *Nguyen* appears to be directed toward delivering a stream of content. Accordingly, there appears to be no motivation or suggestion to “compare graphics image data of a new image . . . with graphics image data of a previous image” or for “selecting blocks of graphics image data of said new image that are different from corresponding blocks of graphics image data of said previous image” as recited by Claim 19. In fact, even if the proposed references are combined, which Applicants respectfully submit is improper, at least the above-referenced limitations remain absent from the purported teachings of the cited references. Therefore, for at least these reasons,

Applicants respectfully submit that the rejection of Claim 19 is improper and should be withdrawn.

Claims 13-18 and 20-25 depend respectively from independent Claims 12 and 19. For at least the reasons discussed above, independent Claims 12 and 19 are in condition for allowance. Therefore, Claims 13-18 and 20-25 are also in condition for allowance, and Applicant respectfully requests that the rejection of Claims 12-25 be withdrawn.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending claims.

No fee is believed due with this Response. If, however, Applicants have overlooked the need for any fee due with this Response, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this Response to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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Date: 11-28-05

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